

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BEATRIZ VEERMAN AND KHADIJETOU :
("KADIA") BA, :

Plaintiffs, :

- against - :

DEEP BLUE GROUP LLC, OPIA, :
FREDERICK LESORT, AND ANTOINE :
BLECH (a/k/a Antoine Bleck), :

Defendants. :
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1:08-CV-05042-LAB

**DECLARATION OF RAYMOND NARDO
IN SUPPORT OF PLAINTIFFS'
APPLICATION FOR FEES**

RAYMOND NARDO, ESQ., pursuant to 28 U.S.C. § 1746, hereby declares under the penalties of perjury as follows:

1. I am an attorney at law. I make this declaration in support of Plaintiffs' application for attorneys' fees in the above-captioned matter. I understand that Plaintiffs were represented in this matter by Goldberg & Fliegel LLP ("G&F").
2. In order to assist the Court in evaluating my declaration, I will describe briefly my professional background. For over 15 years, I have concentrated in Labor & Employment Law, representing employees, employers, and labor unions. I have filed over 100 cases in Federal Court (including the Southern District of New York) and State Court on behalf of my clients. Since 2001 I have also have served as a mediator for the Southern District of New York. I also practice extensively at the Equal Employment Opportunity Commission and New York State Division of Human Rights, and serve as an arbitrator for FINRA and the District Court of Nassau County.
3. I periodically review prevailing market rates in the prevailing community of firms roughly comparable in size and having attorneys of similar skill, experience and standing.

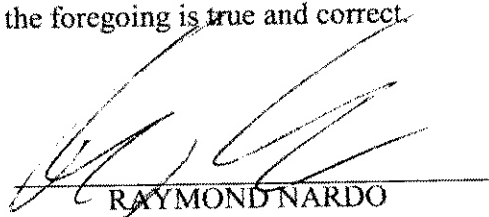
4. I understand that Plaintiffs are seeking attorneys' fees in this matter at a base hourly rate of at least \$400 for time spent by Kenneth A. Goldberg, Esq. and at a base hourly rate of at least \$300 for time spent by Jonathan O. Margolis, Esq., and that Plaintiffs are also seeking an upward adjustment to those base rates due to case-specific factors. The base rates of at least \$400 for Mr. Goldberg and at least \$300 for Mr. Margolis are eminently reasonable.

5. These rates are eminently reasonable given the prevailing market rates for attorneys practicing in federal courts in New York City with comparable skills and experience for similar services. These rates are also particularly reasonable in this matter given Messrs. Goldberg's and Margolis's experience, skill and reputation. Indeed, these base rates for Mr. Goldberg and Mr. Margolis in this matter are actually lower than the prevailing rates at New York City law firms for lawyers of comparable skill, experience and reputation.

6. I understand that Plaintiffs are seeking attorneys' fees in this matter for approximately 600 hours of time spent on this matter by Mr. Goldberg and Mr. Margolis. That amount of time is eminently reasonable given my understanding of the nature of the claims in this matter, the fact that G&F was representing two individual plaintiffs with claims against multiple defendants, and the fact that G&F represented the Plaintiffs at all stages of this litigation, to and including trial and in post-trial proceedings.

7. I swear under penalty of perjury that the foregoing is true and correct.

Dated: July 20, 2010
Mineola, New York



RAYMOND NARDO